

BREMACH, Inc.



P.O. Box 19294
Jean, Nevada 89 019

Phone: (833) BREMACH
FAX: (702) 723-1641

E-mail: info@bremach.us
Website: <http://www.bremach.us/>

November 9, 2020

TO:
David C. Hurlin
EPA Imports Line, Exemptions
Imports@epa.gov

RE: Request for Temporary Importation - TESTING

Request is being made by:
Miro Kefurt, CEO
Bremach, Inc.
PO Box 19294
Jean, NV 89019

Test Purpose:

- 1.) Initial engineering evaluation of the two vehicles to determine if they are capable to meet both EPA and CARB exhaust and evaporative emission standards for 2022 Model Year vehicles.
- 2.) Mileage accumulation on California Reformulated gasoline with 10% Ethanol content and octane rating of 87. Mileage accumulation will be done over 3.7 mile (6 km) track located in Clark County, Nevada and transiting into San Bernardino County California. (Image attached).
- 3.) After accumulation of prescribed 4,000 miles the vehicles will be tested for evaporative emissions in ATDS laboratory in Ontario, California
- 4.) After the mileage accumulation of prescribed 4,000 miles the vehicle will be tested for Exhaust emissions at SAMA laboratory in Diamond Bar, California
- 5.) When above laboratory tests are concluded, based on result the data will be provided to EPA and CARB as part of vehicle certification for 2022 Model Year.

The testing needs to be done in USA as in the country of origin the required gasoline Blend is not available and there are no EPA or CARB certified laboratories (Russian Federation).

Vehicle Identification:

Make: UAZ Brand: UAZ Manufacturer: UAZ LLC Model: Patriot
Vehicle Class: MPV Fuel: Gasoline Engine Type: Four Cylinder Displacement: 2.7L

Vehicle Identification (continued)

Vehicle #1

UAZ 3163-486-67 (model)

XTT316300M1001007 (VIN)

2021 (model Year) □ Manufactured in June 2020

\$16 384 (vehicle value)

Vehicle #2

UAZ 3163-486-67 (model)

XTT316300M1000102 (VIN)

2021 (model Year) Manufactured in June 2020

\$16 384 (vehicle value)

Vehicle ownership (and to whom vehicles will be released and shipped from USA)
(see attached invoice)

INVERSIONES UAZ CHILE SPA

CARMENCITA 290, LAS CONDES, SANTIAGO, CHILE

Reason Exemption is sought:

It is unknown if the vehicles as manufactured are capable of meeting the EPA and CARB requirements for 2022 MY vehicles, until above mileage accumulation and evaporative and Exhaust tests are performed. The vehicle as manufactured currently meet the **EURO 5** environmental standards as per European Union regulations.

(a) estimated of the program duration;

- 1.) Initial engineering evaluation – 3 to 6 weeks
- 2.) Mileage accumulation – less than 3 months
- 3.) Evaporative Emission Testing – about 2 weeks*
- 4.) Exhaust Emission Testing – about 3 weeks*

Items marked with (*) depend on Test laboratory availability and scheduling.

It is expected that all required tests will be concluded not later than December 31, 2021.

(b) the number of vehicles or engines involved; Two Complete Vehicles

(c) year and gross vehicle weight rating of each vehicle or engine.

Model Year 2021 – representative configuration of intended 2022 Model Year

•Weight
(standard car without options) 2125 kg 4684 lb.

•GVWR
(standard car without options) 2650 kg 5842 lb.

•Maximum Load Capacity
(Passengers and cargo) 525 kg 1157 lb.

(ci) Both vehicles are identical except for body color, one is white and the other black

4(a) the technical nature of the test; To determine if vehicles satisfy EPA and CARB requirements for 2022 Model Year gasoline engine vehicles (MPV)

4(b) the site of the test;

Engineering Evaluation: MIROX Corporation, 95 N Cree St, Sandy Valley, Nevada, 89019

Evaporative Test: ATDS 400 S Etiwanda Ave, Ontario, CA 91761

Exhaust Dynamometer Test: SEMA 1575 Valley Vista Drive, Diamond Bar, CA 91765

Mileage accumulation: Sandy Valley Nevada and California (see attached map)

(c) the time or mileage duration of the test;

Mileage accumulation: 4,000 miles on each vehicle

(ci) estimated of the program duration;

1. Initial engineering evaluation – 3 to 6 weeks
2. Mileage accumulation – less than 3 months
3. Evaporative Emission Testing – about 2 weeks*
4. Exhaust Emission Testing – about 3 weeks*

(cii) Items marked with (*) depend on Test laboratory availability and scheduling.

It is expected that all required tests will be concluded not later than December 31, 2021.

(d) the ownership arrangement with regard to the vehicles or engines involved in the test;

Vehicle ownership (and to whom vehicles will be released and shipped from USA)

(see attached invoice)

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CARMENCITA 290, LAS CONDES, SANTIAGO, CHILE

(e) the intended final disposition of the vehicles or engines;

Vehicles will be shipped to:

INVERSIONES UAZ CHILE SPA

CARMENCITA 290, LAS CONDES, SANTIAGO, CHILE

(f) the manner in which vehicle identification numbers or the engine serial numbers will be identified, recorded, and made available;

Photographic Images of the VIN will be made when vehicles arrive to USA (Los Angeles Port)

(g) the means or procedure whereby test results will be recorded.

Mileage accumulation: By Daily Log and also Data Acquisition from OBD II port and additional on board test equipment.

Evaporative Test: From Test results provided by ATDS

Exhaust Test: From Test results provided by SEMA

I hope that above provided information is adequate for EPA to grant the Testing Exemption.

Thank you.

Sincerely



Miro Kefurt - CEO

BREMACH, Inc.

PS: BREMACH, Inc. has manufacturer account with EPA, the identification is **BRH**

Mileage Accumulation Test Track Route:

Map:



Mileage Accumulation as per
Appendix IV to Part 86—Durability Driving Schedules

Mileage Accumulation Test Track Route:

Satellite (Google Maps):



Appendix IV to Part 86—Durability Driving Schedules

(a) Durability Driving Schedule for Light-Duty Vehicles and Light-Duty Trucks.

The schedule consists basically of 11 laps of a 3.7 mile course. The basic vehicle speed for each lap is listed below:

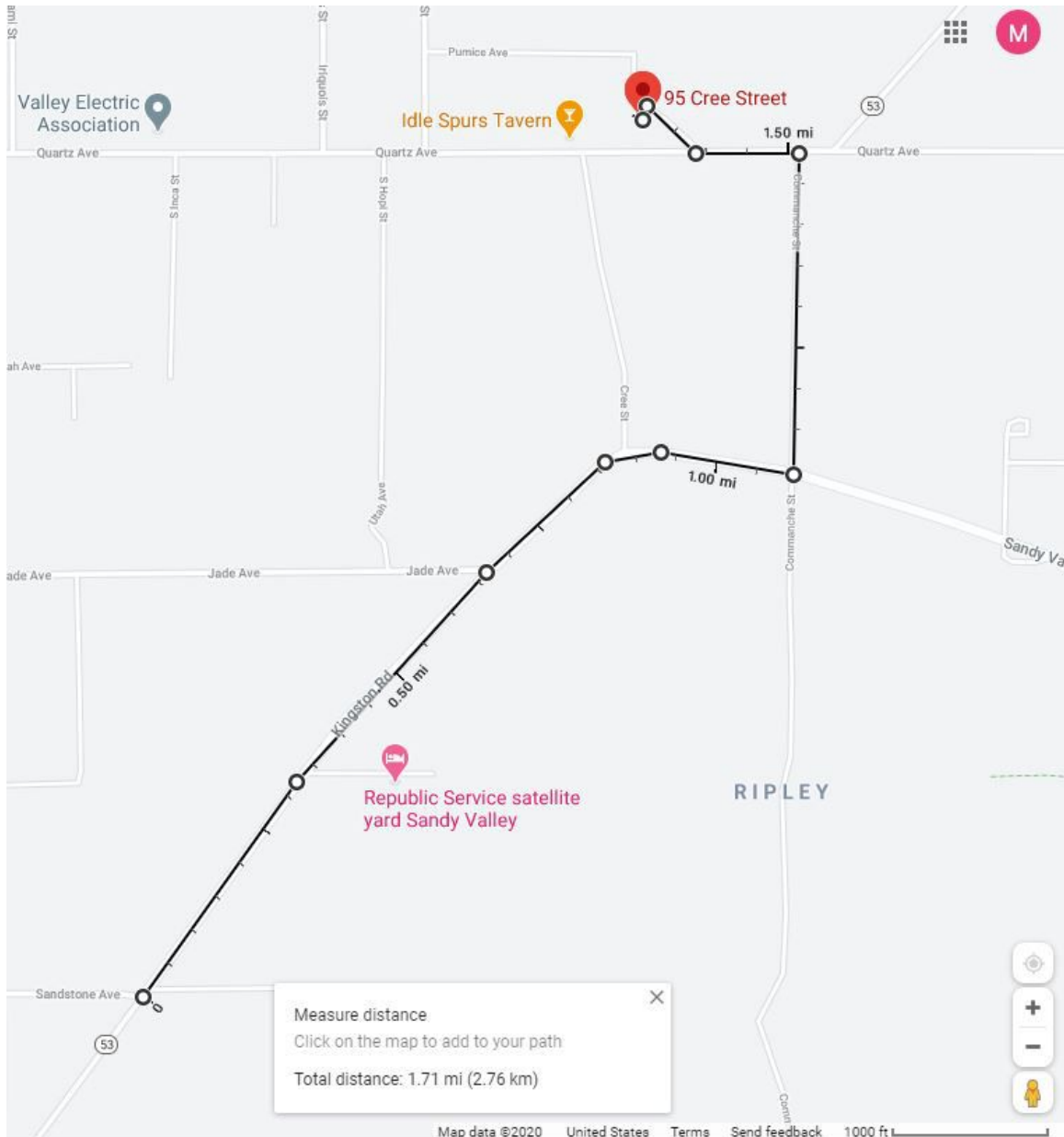
Lap	Speed miles per hour
1	40
2	30
3	40
4	40
5	35
6	30
7	35
8	45
9	35
10	55
11	70

During each of the first nine laps there are 4 stops with 15 second idle. Normal accelerations and decelerations are used. In addition, there are 5 light decelerations each lap from the base speed to 20 m.p.h. followed by light accelerations to the base speed.

The 10th lap is run at a constant speed of 55 m.p.h.

The 11th lap is begun with a wide open throttle acceleration from stop to 70 m.p.h. A normal deceleration to idle followed by a second wide open throttle acceleration occurs at the midpoint of the lap.

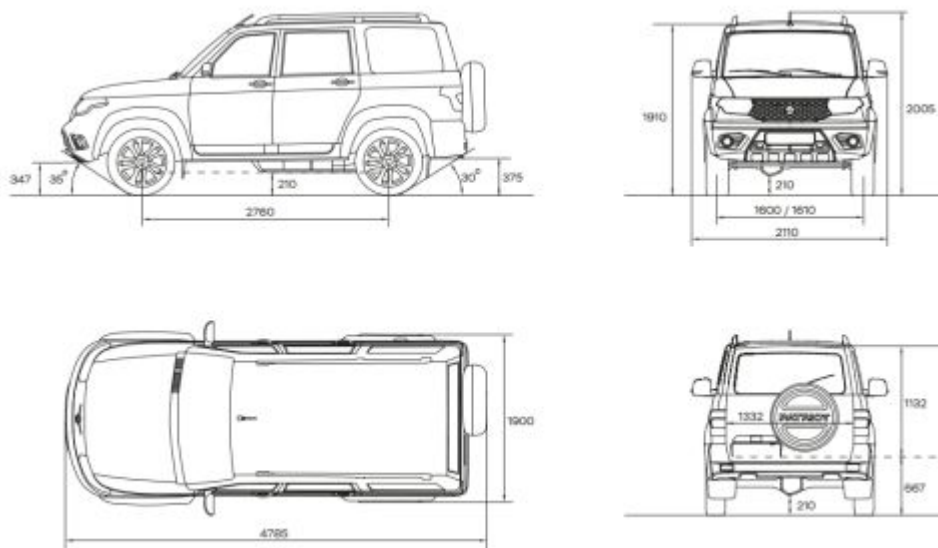
Transit Section from Mileage Accumulation Track
To vehicle service, refueling and overnight storage
Located at 95 N Cree St, Sandy Valley, NV 89019
MIROX Corporation



Vehicle Specifications:

Description		
•Overall Length	4785 mm	188 Inches
•Overall Width	2110 mm	83 Inches
•Overall Height	2005 mm	79 Inches
•Wheelbase	2760 mm	108.7 Inches
•Ground Clearance	210 mm	8.26 Inches
•Entry/Exit Angle	35°	30°
•Ground Clearance	210 mm	8.26 Inches
•Ford Depth	500 mm	19.6 Inches
•Weight (standard car without options)	2125 kg	4684 lb.
•GVWR (standard car without options)	2650 kg	5842 lb.
•Maximum Load Capacity (Passengers and cargo)	525 kg	1157 lb.
•Wheels	18"x6"	Aluminum
•Tire Size	245/60R18	Radial Type
•Front Brakes	Self Adjusting	Hydraulic Disk
•Rear Brakes	Self Adjusting	Hydraulic Drum
• Engine	2.7L 16V In-line 4 cylinder	150hp
• Transmission	6 Speed	Automatic
•Electrical System	12 Volt DC	
•Steering	Rack and Pinion	
•Body	High strength steel	
•Seating Capacity	5	
•Fuel Economy	24.0 MPG	Highway
•Fuel Economy	13.0 MPG	City
•Fuel Economy	18.3 MPG	Combined
•Fuel Tank Capacity	68 Liter	18 US Gallons

Vehicle Details:



Additional vehicle information can be obtained on
<https://uaz.global/cars/suv/upgraded-patriot>

Hurlin, David

From: mirox@aol.com
Sent: Monday, November 09, 2020 5:59 PM
To: Imports
Subject: Re: Request for Temporary Importation - TESTING
Attachments: BREMACH-UAZ-EPA-Test2.pdf; Commercial Invoice Test Cars 2020.pdf; MIDMfrDetails-BREMACH.pdf

See attached documents

Thank you

Miro Kefurt
702-683-8292

-----Original Message-----

From: Imports <Imports@epa.gov>
To: mirox@aol.com <mirox@aol.com>
Sent: Mon, Nov 9, 2020 11:09 am
Subject: RE: Request for Temporary Importation - TESTING

Just email a scanned PDF.

David C. Hurlin
EPA Imports Line, Exemptions
Managed by Jacobs, Contractor to the U.S. EPA
Phone: (734) 214-4098 or 4100
Fax: (734) 214-4676

From: mirox@aol.com <mirox@aol.com>
Sent: Monday, November 09, 2020 1:49 PM
To: Imports <Imports@epa.gov>
Subject: Re: Request for Temporary Importation - TESTING

Hello Mr. Hurlin:

Thank you very much for your fast reply.

Do you want me to mail in hard copy, or is e-mail attachment with the stated purpose adequate.

Sincerely

Miro Kefurt - CEO
Bremach, Inc.

-----Original Message-----

From: Imports <Imports@epa.gov>
To: mirox@aol.com <mirox@aol.com>
Sent: Mon, Nov 9, 2020 6:52 am
Subject: RE: Request for Temporary Importation - TESTING

Attached is the information you will need to include in your application letter to apply for a Testing exemption.

David C. Hurlin

EPA Imports Line, Exemptions
Managed by Jacobs, Contractor to the U.S. EPA
Phone: (734) 214-4098 or 4100
Fax: (734) 214-4676

From: mirox@aol.com <mirox@aol.com>
Sent: Saturday, November 07, 2020 5:15 AM
To: Imports <Imports@epa.gov>
Subject: Request for Temporary Importation - TESTING

To whom it may concern:

We would like to request **EPA letter of approval** for following two vehicles (invoice attached) which will be imported to USA on temporary basis for emission testing to determine if vehicles can meet EPA and CARB requirements for **2022 Model Year** vehicles that are powered by Gasoline fueled engines.

Upon conclusion of the testing, vehicles will be exported to Chile as they are owned by the UAZ Distributor in Chile (see Invoice).

The vehicles meet **EURO 5** standards, but testing in USA on CARB specified reformulated gasoline with 10% Ethanol content is required to determine if the vehicle are capable to meet all EPA and CARB requirements for 2022 MY.

We would like to get testing exemption through December 31, 2021.

Vehicle Manufacturer: **UAZ LLC (See invoice for other details)**

1
UAZ 3163-486-67 (model)
XTT316300M1001007 (VIN)
2021 (model Year)
\$16 384 (vehicle value)
2
UAZ 3163-486-67
XTT316300M1000102
2021
\$16 384 (vehicle value)

Expected date of arrival in Los Angeles, Long Beach November 11, 2020

Container:

MEDU4457549

Tracking info at:

<https://www.track-trace.com/container>

Company Requesting the exemption:

BREMACH, Inc.
PO Box 19294
Jean, NV 89019
USA
(833) 273-6224
<http://bremach.us/contact.html>

Miro Kefurt - CEO
Ray Hoogenraad - President

EPA identifier **BRH**

NHTSA Manufacturer Id is **20037** (NHTSA registration document is attached)

SAE WMI 1B9/980